

Message

From: Mclain, Jennifer [Mclain.Jennifer@epa.gov]
Sent: 2/11/2019 12:34:04 AM
To: Dunlap, David [dunlap.david@epa.gov]
CC: Burneson, Eric [Burneson.Eric@epa.gov]; Wright, Peter [wright.peter@epa.gov]; Ross, David P [ross.davidp@epa.gov]; Wildeman, Anna [wildeman.anna@epa.gov]; Dunn, Alexandra [dunn.alexandra@epa.gov]; Bolen, Brittany [bolen.brittany@epa.gov]; Kramer, Jessica L. [kramer.jessical@epa.gov]; Leopold, Matt (OGC) [Leopold.Matt@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]; Bodine, Susan [bodine.susan@epa.gov]
Subject: Re: For Review: PFAS Action Plan Wehrum, Bill <Wehrum.Bill@epa.gov>

Thanks!

Jennifer

On Feb 10, 2019, at 7:33 PM, Dunlap, David <dunlap.david@epa.gov> wrote:

Finished my review. No more comments from me.

DDD

David D. Dunlap
O – 202.564.6620

From: Burneson, Eric
Sent: Sunday, February 10, 2019 7:21 PM
To: Dunlap, David <dunlap.david@epa.gov>
Cc: Mclain, Jennifer <Mclain.Jennifer@epa.gov>; Wright, Peter <wright.peter@epa.gov>; Ross, David P <ross.davidp@epa.gov>; Wildeman, Anna <wildeman.anna@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Brittany <bolen.brittany@epa.gov>; Kramer, Jessica L. <kramer.jessical@epa.gov>; Leopold, Matt (OGC) <Leopold.Matt@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>
Subject: Re: For Review: PFAS Action Plan Wehrum, Bill <Wehrum.Bill@epa.gov>

Got it. Thanks David. We will fold this in with the others and send the document back to OMB. Thanks to all for looking at this today.

Eric Burneson

Sent from my iPhone

On Feb 10, 2019, at 7:18 PM, Dunlap, David <dunlap.david@epa.gov> wrote:

One minor comment:

Page 14

- Consumption of food that came into contact with PFAS-containing products such as microwaveable popcorn bags and grease-resistant paper;

This statement seems to imply that all popcorn bags and grease-resistant paper contain PFAS. That is certainly not the case with grease-resistant paper. I suggest a minor modification -

- Consumption of food that came into contact with PFAS-containing products (e.g. some ~~such as~~ microwaveable popcorn bags and grease-resistant papers)

I will be finished no later than 8pm.

DDD

David D. Dunlap
O – 202.564.6620

From: Dunlap, David
Sent: Sunday, February 10, 2019 6:48 PM
To: Mclain, Jennifer <Mclain.Jennifer@epa.gov>
Cc: Wright, Peter <wright.peter@epa.gov>; Ross, David P <ross.davidp@epa.gov>; Wildeman, Anna <wildeman.anna@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Brittany <bolen.brittany@epa.gov>; Kramer, Jessica L. <kramer.jessical@epa.gov>; Leopold, Matt (OGC) <Leopold.Matt@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Burneson, Eric <Burneson.Eric@epa.gov>
Subject: Re: For Review: PFAS Action Plan Wehrum, Bill <Wehrum.Bill@epa.gov>

Reviewing now.

David D. Dunlap
Deputy Assistant Administrator
EPA Office of Research & Development
Office 202.564.4941

On Feb 10, 2019, at 5:15 PM, Mclain, Jennifer <Mclain.Jennifer@epa.gov> wrote:

Perfect, thank you Peter. As I mentioned we will clarify the titles to make the story flow.

From: Wright, Peter
Sent: Sunday, February 10, 2019 5:14 PM
To: Ross, David P <ross.davidp@epa.gov>; Mclain, Jennifer <Mclain.Jennifer@epa.gov>
Cc: Wildeman, Anna <wildeman.anna@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Brittany <bolen.brittany@epa.gov>; Kramer, Jessica L. <kramer.jessical@epa.gov>; Leopold, Matt (OGC) <Leopold.Matt@epa.gov>; Dunlap, David <dunlap.david@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Burneson, Eric <Burneson.Eric@epa.gov>
Subject: Re: For Review: PFAS Action Plan Wehrum, Bill <Wehrum.Bill@epa.gov>

Dave and Jennifer

This sounds good to me to keep the sections as is.

Peter

Sent from my iPhone

On Feb 10, 2019, at 4:23 PM, Ross, David P <ross.davidp@epa.gov> wrote:

Thanks Jennifer. This is the only way to maintain allegiance to AAW's preferred outline.

We have heard from Peter and Susan.

Alex and David, speak now or forever hold your peace. The team is moving a final, close out redline back to OMB tonight.

Thanks.

Dave

Sent from my iPad

On Feb 10, 2019, at 4:14 PM, McClain, Jennifer <McClain.Jennifer@epa.gov> wrote:

Peter

Is this a correct characterization of your proposal: Keep sections V and section VI as is, including the insert from OMB in section VI referencing the GW clean up values.

Dave Ross suggested that we develop new titles for the sections V and VI to better reflect their content. We will do that.

Jennifer

On Feb 10, 2019, at 1:19 PM, Wright, Peter <wright.peter@epa.gov> wrote:

All:

OMB wants language on pages 32 -33 under the subheading "Hazardous Substance Listing for PFAS" that addresses OLEM's development of groundwater cleanup standard removed because the language does not related directly to the subheading. The development of the groundwater standard is fundamental to what

OLEM is doing to the major heading for Section VI "Identifying and Addressing PFAS Exposures: What the EPA is Doing to Help Identify and Mitigate PFAS Exposures in Affected Communities."

OLEM's work to develop groundwater cleanup standards is found in Section V "Understanding and Addressing PFAS Toxicity" under the subheading of "Groundwater Cleanup Recommendations for PFOA and PFOS" on pages 24 and 25.

There is not much text in Section V and so maybe OLEM's groundwater cleanup criteria was moved to Section V as it could have as readily or more obviously been in Section VI.

My recommendation is to leave the sentences on the groundwater criteria in Section VI where those sentences are now so that they are connected to the work OLEM is doing on hazardous substance listing and both of these matters are directly related to Section VI. I would think that the public's reading of this document would be guided by the major headings and so it is important to discuss

the Section VI related activities in Section VI, even if the heading is not perfect. This also minimizes the need for more edits than say moving the OLEM groundwater guidance to section VI out of Section V.

In the end this is an editorial decision for the editors of the document.

The most important language to OLEM is the last sentence in the OLEM section on page 33 that as edited now makes clear the regulatory process for CERCLA listing has been initiated.

Peter

Peter C Wright
Special Counsel, Office
of the Administrator
United States
Environmental
Protection Agency
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NW
Washington, DC
202-566-9988

From: Mclain, Jennifer
Sent: Saturday,
February 9, 2019 5:25
PM
To: Ross, David P
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; Wildeman, Anna
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>; Wehrum, Bill
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>

Subject: For Review:
PFAS Action Plan

Deliberative – Pre
Decisional

All,

For your review and input, please find the revised PFAS Action plan. This version includes recommended edits/responses to the most recent round of interagency edits/comments that we received on Thursday evening. We met with OMB on Friday afternoon and resolved a number of issues. Three issues were elevated: enforcement language, characterization of the drinking water standard action, and characterization of the hazardous substance listing action. It is my understanding that senior level discussions to resolve these issues are ongoing/planned.

To facilitate your review, the document contains a color scheme for the comments and changed text:

- a. The GREEN = OMB or other agency partner s edits/s uggesti on accepte d with no/littl e change
- b. YELLO W = OMB or other agency partner edits/s uggesti on accepte d with varying degrees of edits
- c. PURPLE = did not accept the edit, added an explana tion as to why.
- d. BLUE = added senior leadership edit

The attached version reflects the following:

- Considered comments from all interagency reviewer comments received, even those that came in late (e.g., FDA).
- Edits/responses from EPA program offices (OECA, OLEM, OPPT, ORD, OW)
- Formatting needs to be fixed prior to finalization.
- Viewing the document as “All Markup” under the Review Tab will allow you to see redline/strikeout and all of OMB’s comments and EPA’s responses. Viewing the document as “No Markup” will provide the proposed final text.

We would appreciate your comments/changes as soon as possible but by Sunday, latest. Our goal is to send OMB a final redline version of the document by Monday morning to facilitate clearance as early as possible on Monday so that we can move into

production mode for
the planned Thursday
release.

Many thanks for your
and your staffs'
continued
responsiveness and
support. Please let me
know if you need this in
a different format or
have any questions.

Jennifer

Jennifer L McLain
Acting Director
Office of Ground Water
and Drinking Water
U.S. EPA
202-564-4029